

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and
BTA BANK JSC;

Plaintiffs,

-against-

FELIX SATER, DANIEL RIDLOFF,
BAYROCK GROUP INC., GLOBAL
HABITAT SOLUTIONS, INC., RRMI-
DR LLC, FERRARI HOLDINGS LLC,
and MEM ENERGY PARTNERS LLC;

Defendants.

1:19-cv-02645 (AJN)(KHP)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE, upon the attached Memorandum of Law and all other papers and proceedings herein, Defendant, MeM Energy Partners LLC shall move before this Court, before the Honorable Katherine H. Parker, at the Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court for an order: pursuant to Federal Rule of Civil Procedure 12(b)(6) and 8(a) dismissing the claims against MeM Energy Partners LLC in the First Amended Complaint, and granting MeM Energy Partners LLC other, further, and different relief the Court deems just and proper. The basis for the motion is set forth in the accompanying memorandum of law.

Dated: October 13, 2021
New York, NY

/s/ Jason Cyrulnik
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